#### **GIDEON KRACOV**

Attorney at Law

801 South Grand Avenue 11th Floor Los Angeles, California 90017

(213) 629-2071 Fax: (213) 623-7755

gk@gideonlaw.net www.gideonlaw.net

#### VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

April 14, 2014

Fernando Franco, Area Manager Linde LLC 2535 Del Amo Blvd. Torrance, CA 90503

Brian Thiesse, Technical Manager Linde LLC 575 Mountain Ave. Murray Hill, NJ 07974

Danny W. Reed, West Region CO2 Engineer Linde LLC 2535 Del Amo Blvd. Torrance, CA 90503

Patrick F. Murphy, President Linde North America 575 Mountain Ave. Murray Hill, NJ 07974

CSC Lawyers Incorporating Service Agent for Service for Linde LLC 2710 Gateway Oaks Dr Ste. 150N Sacramento, CA 95833

Re: Notice of Violations and Intent to File Suit Under the Federal Water Pollution Control Act

Dear Linde LLC, Linde North America, Fernando Franco, Brian Thiesse, Danny Reed and Patrick Murphy:

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I am writing on behalf of California Communities Against Toxics ("CCAT") with regard to violations of the Clean Water Act ("Act") that CCAT believes are occurring Linde LLC, 2535 Del Amo Blvd., Torrance, CA 90503 ("Facility").

CCAT is a non-profit association dedicated to working with communities to advocate for environmental justice and pollution prevention. It has members living in the community adjacent to the Facility and the Dominguez Watershed. CCAT and its members are deeply concerned with protecting the environment in and around their communities, including the Dominguez Watershed. This letter is being sent to you as the responsible owners, officers, or operators of the Facility (all recipients are hereinafter collectively referred to as "Linde").

This letter addresses Linde's unlawful discharge of pollutants from the Facility through the Los Angeles municipal storm sewer system into Dominguez Channel, which empties into the East Basin of the Los Angeles Harbor. The Facility is discharging storm water pursuant to National Pollutant Discharge Elimination System ("NPDES") Permit No. CA S000001, California Regional Water Quality Control Board, San Francisco Bay Region ("Regional Board") Order No. 92-12-DWQ as amended by Order No. 97-03-DWQ (hereinafter "General Permit"). The WDID identification number for the Facility listed on documents submitted to the Regional Board is No. 4 19I009867. The Facility is engaged in ongoing violations of the substantive and procedural requirements of the General Permit.

Section 505(b) of the Clean Water Act requires a citizen to give notice of intent to file suit sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Act (33 U.S.C. § 1365(a)). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency ("EPA") and the State in which the violations occur.

As required by the Clean Water Act, this Notice of Violation and Intent to File Suit provides notice of the violations that have occurred, and continue to occur, at the Facility. Consequently, Linde is hereby placed on formal notice by CCAT that, after the expiration of sixty days from the date of this Notice of Violations and Intent to Sue, CCAT intends to file suit in federal court against Linde LLC, Fernando Franco, Brian Thiesse, Danny W Reed, and Linde North America ('Linde") under Section 505(a) of the Clean Water Act (33 U.S.C. § 1365(a)), for

<sup>&</sup>lt;sup>1</sup> On April 1, 2014, the State Board reissued the General Permit, continuing its mandate that industrial facilities implement the best available technology economically achievable ("BAT") and best conventional pollutant control technology ("BCT") and, in addition, establishing numeric action levels mandating additional control efforts. State Board Order 2014-0057-DWQ. The new permit, however, does not go into effect until July 1, 2015. Until that time, the current General Permit remains in full force and effect.

violations of the Clean Water Act and the General Permit. These violations are described more extensively below.

## I. Background.

On March 5, 1993, Linde filed a Notice of Intent to Comply with the Terms of the General Permit to Discharge Storm Water Associated with Industrial Activity ("NOI"). This NOI was signed by Robert Flage, the Assistant Operations Manager. On its NOI, Linde certified that the Facility is classified under SIC Codes 2813 ("Industrial Gases"). Linde is a manufacturer and supplier of industrial, specialty and medical gases. Additionally, on June 27, 2011, Linde filed a subsequent NOI, classifying the facility under SIC Code 2813. On information and belief, CCAT alleges that all storm water discharges from the Facility contain storm water that is commingled with runoff from the Facility from areas where industrial processes occur.

The Facility collects and discharges storm water from its industrial site into at least one storm water outfall located at the Facility. The storm water discharged from that outfall is then discharged to the County of Los Angeles storm drain system, which is then discharged to the Dominguez Channel, which flows into the East Basin of the Los Angeles Harbor.

The Regional Board has identified beneficial uses of the Dominguez Watershed and established water quality standards for it in the "Water Quality Control Plan – Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties", generally referred to as the Basin Plan. See <a href="http://www.waterboards.ca.gov/losangeles/water\_issues/">http://www.waterboards.ca.gov/losangeles/water\_issues/</a> programs/basin\_plan/basin\_plan\_documentation.shtml. The beneficial uses of these waters include, among others, preservation of rare and endangered species, municipal supply, estuarine, marine and wildlife habitat, and migration of aquatic organisms. Visible pollution, including visible sheens and cloudy or muddy water from industrial areas, impairs people's use of the Dominguez Channel and Los Angeles Harbor for contact and non-contact water recreation.

The Basin Plan includes a narrative toxicity standard which states that "[a]ll waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant, animal, or aquatic life." *Id.* at 3-16. The Basin Plan includes a narrative oil and grease standard which states that "[w]aters shall not contain oils, greases, waxes, or other materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect beneficial uses." *Id.* at 3-11. The Basin Plan provides that "[w]aters shall not contain suspended or settleable material in concentrations that cause nuisance or

<sup>&</sup>lt;sup>2</sup> See Table 8.C-1 of the MSGP for SIC Code 2813.

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adversely affect beneficial uses." *Id.* at 3-16. The Basic Plan provides that "[t]he pH of bays or estuaries [or inland surface waters] shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges." *Id.* at 3-15. The Basin Plan provides that "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use." *Id.* at 3-8. The Basin Plan provides that "[w]ater shall not contain floating materials, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses." *Id.* at 3-9.

The EPA has published benchmark levels as guidelines for determining whether a facility discharging industrial storm water has implemented the requisite best available technology economically achievable ("BAT") and best conventional pollutant control technology ("BCT"). The following benchmarks have been established for pollutants discharged by Linde: total suspended solids ("TSS") – 100 mg/L; oil and grease ("O&G") – 15 mg/L; chemical oxygen demand ("COD") – 120 mg/L; iron – 1.0 mg/L; aluminum – 0.75 mg/L; and nitrate plus nitrate nitrogen ("N+N") – 0.68 mg/L. EPA, Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (2009) (hereinafter "MSGP").

### II. Alleged Violations of the NPDES Permit.

## A. Discharges in Violation of the Permit.

Linde has violated and continues to violate the terms and conditions of the General Permit. Section 402(p) of the Act prohibits the discharge of storm water associated with industrial activities, except as permitted under an NPDES permit (33 U.S.C. § 1342) such as the General Permit. The General Permit prohibits any discharges of storm water associated with industrial activities or authorized non-storm water discharges that have not been subjected to BAT or BCT. Effluent Limitation B(3) of the General Permit requires dischargers to reduce or prevent pollutants in their storm water discharges through implementation of BAT for toxic and nonconventional pollutants and BCT for conventional pollutants. BAT and BCT include both nonstructural and structural measures. General Permit, Section A(8). Conventional pollutants are TSS, O&G, pH, biochemical oxygen demand ("BOD"), and fecal coliform. 40 C.F.R. § 401.16. All other pollutants are either toxic or nonconventional. *Id.*; 40 C.F.R. § 401.15.

In addition, Discharge Prohibition A(1) of the General Permit prohibits the discharge of materials other than storm water (defined as non-storm water discharges) that discharge either directly or indirectly to waters of the United States. Discharge Prohibition A(2) of the General Permit prohibits storm water discharges and authorized non-storm water discharges that cause or threaten to cause pollution, contamination, or nuisance.

<sup>&</sup>lt;sup>3</sup> See Table 8.C-1 of the MSGP for SIC Code 2813.

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Receiving Water Limitation C(1) of the General Industrial Storm Water Permit prohibits storm water discharges and authorized non-storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) of the General Permit also prohibits storm water discharges and authorized non-storm water discharges that cause or contribute to an exceedance of any applicable water quality standards contained in a Statewide Water Quality Control Plan or the applicable Regional Board's Basin Plan. The General Permit does not authorize the application of any mixing zones for complying with Receiving Water Limitation C(2). As a result, compliance with this provision is measured at the Facility's discharge monitoring locations.

Linde has discharged and continues to discharge storm water with unacceptable levels of TSS, O&G, COD, iron, aluminum, N+N, and other pollutants in violation of the General Permit. Linde's sampling and analysis results reported to the Regional Board confirm discharges of specific pollutants and materials other than storm water in violation of the Permit provisions listed above. Self-monitoring reports under the Permit are deemed "conclusive evidence of an exceedance of a permit limitation." Sierra Club v. Union Oil, 813 F.2d-1480, 1493 (9th Cir. 1988).

The following discharges of pollutants from the Facility have contained concentrations of pollutants in excess of numeric water quality standards established in the Basin Plan and have thus violated Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) and are evidence of ongoing violations of Effluent Limitation B(3) of the General Industrial Storm Water Permit.

Date	Parameter	Observed Concentration	Basin Plan Water Quality Objective	Location (as identified by the Facility)
01/24/2013	Aluminum	3.97 mg/L	1.0 mg/L (MCL)	Stormwater Drain
11/29/2012	Aluminum	11.5 mg/L	1.0 mg/L (MCL)	Stormwater Drain
11/12/2011	Aluminum	18.8 mg/L	1.0 mg/L (MCL)	Stormwater Drain
11/04/2011	Aluminum	5.45 mg/L	1.0 mg/L (MCL)	Stormwater Drain

The information in the above table reflects data gathered from Linde's self-monitoring during the 2011-2012 and 2012-2013 wet seasons. CCAT alleges that during each of those rainy

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seasons and continuing through today, Linde has discharged storm water contaminated with pollutants at levels that exceed one or more applicable water quality standards, including but not limited to each of the following:

Aluminum – 1.0 mg/L (MCL)

The following discharges of pollutants from the Facility have violated Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) and are evidence of ongoing violations of Effluent Limitation B(3) of the General Industrial Storm Water Permit.

Date	Parameter	Observed Concentration	EPA Benchmark Value	Location (as identified by the Facility)
01/24/2013	Aluminum	3.97 mg/L	0.75 mg/L	Stormwater Drain
12/29/2012	Aluminum	11.5 mg/L	0.75 mg/L	Stormwater Drain
11/12/2011	Aluminum	18.8 mg/L	0.75 mg/L	Stormwater Drain
11/4/2011	Aluminum	5.45 mg/L	0.75 mg/L	Stormwater Drain
01/24/2013	Iron	5.35 mg/L	1.0 mg/L	Stormwater Drain
12/29/2012	Iron	16.2 mg/L	1.0 mg/L	Stormwater Drain
11/12/2011	Iron	22.9 mg/L	1.0 mg/L	Stormwater Drain
11/4/2011	Iron	6.53 mg/L	1.0 mg/L	Stormwater Drain
11/12/2011	COD	187 mg/L	120 mg/L	Stormwater Drain
11/04/2011	COD	195 mg/L	120 mg/L	Stormwater Drain
12/07/2009	O&G	18 mg/L	15 mg/L	Stormwater Drain
01/24/2013	N+N	4.23 mg/L	0.68 mg/L	Stormwater Drain

12/29/2012	N+N	5.19 mg/L	0.68 mg/L	Stormwater Drain
11/12/2011	N+N	5.73 mg/L	0.68 mg/L	Stormwater Drain
11/04/2011	N+N	3.6 mg/L	0.68 mg/L	Stormwater Drain
01/24/2013	TSS	111 mg/L	100 mg/L	Stormwater Drain
12/29/2012	TSS	484 mg/L	100 mg/L	Stormwater Drain
11/12/2011	TSS	767 mg/L	100 mg/L	Stormwater Drain
11/04/2011	TSS	606 mg/L	100 mg/L	Stormwater Drain
10/06/2010	TSS	308 mg/L	100 mg/L	Stormwater Drain
12/07/2009	TSS	390 mg/L	100 mg/L	Stormwater Drain
10/13/2009	TSS	424 mg/L	100 mg/L	Stormwater Drain

The information in the above table reflects data gathered from Linde's self-monitoring during the 2009-2010, 2010-2011, 2011-2012 and 2012-2013 wet seasons. CCAT alleges that during each of those rainy seasons and continuing through today, Linde has discharged storm water contaminated with pollutants at levels that exceed one or more applicable EPA Benchmarks, including but not limited to each of the following:

 $TSS-100 \text{ mg/L} \\ N+N-0.68 \text{ mg/L} \\ Oil \& Grease-15 \text{ mg/L} \\ COD-120 \text{ mg/L} \\ Iron-1.0 \text{ mg/L} \\ Aluminum-0.75 \text{ mg/L} \\$ 

CCAT's investigation, including its review of Linde's analytical results documenting pollutant levels in the Facility's storm water discharges well in excess of applicable water quality standards and EPA's benchmark values indicates that Linde has not implemented BAT and BCT at the Facility for its discharges of TSS, N+N, O&G, COD, iron, aluminum, and other pollutants, in violation of Effluent Limitation B(3) of the General Permit. Linde was required to have

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implemented BAT and BCT by no later than October 1, 1992, or since the date the Facility opened. Thus, Linde is discharging polluted storm water associated with its industrial operations without having implemented BAT and BCT.

In addition, the numbers listed in the table above indicate that the Facility is discharging polluted storm water in violation of Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) of the General Permit. CCAT alleges that such violations also have occurred and will occur on other rain dates, including every significant rain event that has occurred since April 14, 2009 and that will occur at the Facility subsequent to the date of this Notice of Violation and Intent to File Suit. Attachment A, attached hereto, sets forth each of the specific rain dates on which CCAT alleges that Linde has discharged storm water containing impermissible levels of TSS, N+N, O&G, COD, iron, aluminum, and other pollutants in violation of Effluent Limitation B(3), Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) of the General Permit.<sup>4</sup>

# B. Failure to Develop and Implement an Adequate Monitoring and Reporting Program

Section B of the General Permit describes the monitoring requirements for storm water and non-storm water discharges. Facilities are required to make monthly visual observations of storm water discharges (Section B(4)) and quarterly visual observations of both unauthorized and authorized non-storm water discharges (Section B(3)). Section B(5) requires facility operators to sample and analyze at least two storm water discharges from all storm water discharge locations during each wet season. Section B(7) requires that the visual observations and samples must represent the "quality and quantity of the facility's storm water discharges from the storm event."

The above-referenced data was obtained from the Facility's monitoring program as reported in its Annual Reports submitted to the Regional Board. This data is evidence that the Facility has violated various Discharge Prohibitions, Receiving Water Limitations, and Effluent Limitations in the General Permit. To the extent the storm water data collected by Linde is not representative of the quality of the Facility's various storm water discharges, CCAT alleges that the Facility's monitoring program violates Sections B(3), (4), (5) and (7) of the General Permit. CCAT also alleges that Linde has failed to conduct monthly visual observations of all storm water discharge locations at the Facility during the following months of the indicated years:

2009: April

2010: October, November, December

<sup>&</sup>lt;sup>4</sup> The rain dates are all the days when an average of 0.1" or more rain fell as measured by a weather station located in Long Beach approximately 15 miles away from the Facility.

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2011: January, February, March, April, May, October, November, December 2012: October, November

On information and belief, CCAT alleges that Linde failed to sample for iron, aluminum and N+N as required under SIC Code 2813 on during all rain events during the 2009-2010 and 2011-2012 wet seasons. Additionally, CCAT alleges that Linde failed to sample for COD during the 2009-2010, 2010-2011, and 2012-2013 wet seasons.

The above violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Linde is subject to penalties for violations of the General Permit and the Act's monitoring and sampling requirements since April 14, 2009.

# C. Failure to Prepare, Implement, Review and Update an Adequate Storm Water Pollution Prevention Plan.

Section A and Provision E(2) of the General Industrial Storm Water Permit require dischargers of storm water associated with industrial activity to develop, implement, and update an adequate storm water pollution prevention plan ("SWPPP") no later than October 1, 1992. Section A(1) and Provision E(2) requires dischargers who submitted an NOI pursuant to the General Permit to continue following their existing SWPPP and implement any necessary revisions to their SWPPP in a timely manner, but in any case, no later than August 1, 1997.

The SWPPP must, among other requirements, identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm and non-storm water discharges from the facility and identify and implement site-specific best management practices ("BMPs") to reduce or prevent pollutants associated with industrial activities in storm water and authorized non-storm water discharges (General Permit, Section A(2)). The SWPPP must include BMPs that achieve BAT and BCT (Effluent Limitation B(3)). The SWPPP must include: a description of individuals and their responsibilities for developing and implementing the SWPPP (General Permit, Section A(3)); a site map showing the facility boundaries, storm water drainage areas with flow pattern and nearby water bodies, the location of the storm water collection, conveyance and discharge system, structural control measures, impervious areas, areas of actual and potential pollutant contact, and areas of industrial activity (General Permit, Section A(4)); a list of significant materials handled and stored at the site (General Permit, Section A(5)); a description of potential pollutant sources including industrial processes, material handling and storage areas, dust and particulate generating activities, a description of significant spills and leaks, a list of all non-storm water discharges and their sources, and a description of locations where soil erosion may occur (General Permit, Section A(6)).

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The SWPPP also must include an assessment of potential pollutant sources at the Facility and a description of the BMPs to be implemented at the Facility that will reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges, including structural BMPs where non-structural BMPs are not effective (General Permit, Section A(7), (8)). The SWPPP must be evaluated to ensure effectiveness and must be revised where necessary (General Permit, Section A(9), (10)).

CCAT's investigation of the conditions at the Facility, as well as, its Annual Reports indicate that Linde has been operating with an inadequately developed or implemented SWPPP in violation of the requirements set forth above. Linde has failed to evaluate the effectiveness of its BMPs and to revise its SWPPP as necessary. Linde has been in continuous violation of Section A and Provision E(2) of the General Permit every day since April 14, 2009, at the very latest, and will continue to be in violation every day that Linde fails to prepare, implement, review, and update an effective SWPPP. Linde is subject to penalties for violations of the Order and the Act occurring since April 14, 2009.

#### D. Failure to File True and Correct Annual Reports.

Section B(14) of the General Industrial Storm Water Permit requires dischargers to submit an Annual Report by July 1st of each year to the executive officer of the relevant Regional Board. The Annual Report must be signed and certified by an appropriate corporate officer. General Permit, Sections B(14), C(9), (10). Section A(9)(d) of the General Industrial Storm Water Permit requires the discharger to include in their annual report an evaluation of their storm water controls, including certifying compliance with the General Industrial Storm Water Permit. See also General Permit, Sections C(9) and (10) and B(14).

For the last four years, Jason Lacasella, Danny Reed, Brian Thiesse, Linde and it's agents inaccurately certified in their Annual Reports that the facility was in compliance with the General Permit. Consequently, Linde has violated Sections A(9)(d), B(14) and C(9) & (10) of the General Industrial Storm Water Permit every time Linde failed to submit a complete or correct report and every time Linde or its agents falsely purported to comply with the Act. Linde is subject to penalties for violations of Section (C) of the General Industrial Storm Water Permit and the Act occurring since April 14, 2009.

#### III. Persons Responsible for the Violations.

CCAT puts Linde LLC, Fernando Franco, Brian Thiesse, Danny W. Reed, and Linde North America on notice that they are the persons responsible for the violations described above.

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If additional persons are subsequently identified as also being responsible for the violations set forth above, CCAT puts Linde LLC, Fernando Franco, Brian Thiesse, Danny W. Reed, and Linde North America on notice that it intends to include those persons in this action.

### IV. Name and Address of Noticing Parties.

The name, address and telephone number of California Communities Against Toxics is as follows:

Jane Williams
Executive Director
California Communities Against Toxics
P.O. Box 845
Rosamond, CA 93560
Tel. (661) 510-3412

#### V. Counsel.

CCAT has retained counsel to represent it in this matter. Please direct all communications to:

Gideon Kracov
The Law Office of Gideon Kracov
801 South Grand Avenue
11th Floor
Los Angeles, California 90017
Tel: (213) 629-2071

E-mail: gk@gideonlaw.net

Michael R. Lozeau Douglas J. Chermak Lozeau Drury LLP 410 12th Street Suite 250 Oakland, California 94607

Tel: (510) 836-4200

E-mail: michael@lozeaudrury.com E-mail: doug@lozeaudrury.com

#### VI. Penalties.

Pursuant to Section 309(d) of the Act (33 U.S.C. § 1319(d)) and the Adjustment of Civil Monetary Penalties for Inflation (40 C.F.R. § 19.4) each separate violation of the Act subjects Linde to a penalty of up to \$37,500 per day per violation. In addition to civil penalties, CCAT will seek injunctive relief preventing further violations of the Act pursuant to Sections 505(a) and (d) (33 U.S.C. §1365(a) and (d)) and such other relief as permitted by law. Lastly, Section

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505(d) of the Act (33 U.S.C. § 1365(d)), permits prevailing parties to recover costs and fees, including attorneys' fees.

CCAT believes this Notice of Violations and Intent to File Suit sufficiently states grounds for filing suit. CCAT intends to file a citizen suit under Section 505(a) of the Act against Linde and its agents for the above-referenced violations upon the expiration of the 60-day notice period. However, during the 60-day notice period, CCAT would be willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, CCAT suggests that you initiate those discussions with counsel listed below within the next 20 days so that they may be completed before the end of the 60-day notice period. CCAT does not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

Gideon Kracov

The Law Office of Gideon Kracov Attorneys for California Communities Against Toxics Linde LLC April 14, 2014 Page 13 of 15

### SERVICE LIST VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Gina McCarthy, Administrator U.S. Environmental Protection Agency 12000 Pennsylvania Avenue, N.W. Washington, D.C. 20460

Thomas Howard, Executive Director State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Eric Holder, U.S. Attorney General U.S. Department of Justice 950 Pennsylvania Avenue, N.W. Washington, DC 20530-0001

Citizen Suit Coordinator Environment and Natural Resources Division Law and Policy Section P.O. Box 7415 Ben Franklin Station Washington, DC 20044-7415

Jared Blumenfeld, Regional Administrator U.S. EPA – Region 9 75 Hawthorne Street San Francisco, CA 94105

Samuel Unger, Executive Officer Los Angeles Regional Water Quality Control Board 320 West Fourth Street, Suite 200 Los Angeles, CA 90013

# ATTACHMENT A

Rain Dates, 1	Linde	Technol	ogies.	Torrance.	California
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10/13/2009       2/25/2011       1/25/20         10/14/2009       2/26/2011       2/8/20         12/7/2009       3/20/2011       2/19/20         12/11/2009       3/21/2011       3/8/20         12/12/2009       3/23/2011       5/6/20         12/13/2009       3/25/2011       5/17/20         1/13/2010       3/27/2011       12/19/20         1/14/2010       5/17/2011       2/6/20         1/17/2010       10/4/2011       2/27/20         1/18/2010       10/5/2011       3/1/20         1/19/2010       11/4/2011       4/1/20         1/20/2010       11/6/2011       4/2/20         1/21/2010       11/12/2011       4/2/20         1/25/2010       1/21/2012       2/6/2010         2/15/2010       2/15/2012       2/15/2012         2/19/2010       2/27/2012       2/27/2012         2/23/2010       3/17/2012       2/27/2012         2/27/2010       3/18/2012	
12/7/2009       3/20/2011       2/19/20         12/11/2009       3/21/2011       3/8/20         12/12/2009       3/23/2011       5/6/20         12/13/2009       3/25/2011       5/17/20         1/13/2010       3/27/2011       2/6/20         1/14/2010       5/17/2011       2/6/20         1/17/2010       10/4/2011       2/28/20         1/18/2010       10/5/2011       3/1/20         1/19/2010       11/4/2011       4/1/20         1/20/2010       11/6/2011       4/2/20         1/21/2010       11/12/2011       4/2/20         1/25/2010       1/21/2012       2/6/2010         2/15/2010       2/15/2012       2/15/2012         2/19/2010       2/15/2012       2/27/2012         2/23/2010       3/17/2012       3/17/2012	
12/11/2009       3/21/2011       3/8/20         12/12/2009       3/23/2011       5/6/20         12/13/2009       3/25/2011       5/17/20         1/13/2010       3/27/2011       12/19/20         1/14/2010       5/17/2011       2/6/20         1/17/2010       10/4/2011       2/28/20         1/18/2010       10/5/2011       3/1/20         1/19/2010       11/4/2011       4/1/20         1/20/2010       11/6/2011       4/2/20         1/21/2010       11/20/2011       4/2/20         1/25/2010       1/21/2012       2/5/2010         2/6/2010       2/15/2012       2/15/2012         2/19/2010       2/27/2012       2/27/2012         2/23/2010       3/17/2012       2/27/2012	
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